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Attorneys for Plaintiff  
and Third-Party Defendants,  
the SS Entities

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

SPORTS SHINKO CO., LTD.,  
a Japanese corporation,

Plaintiff,

vs.

QK HOTEL, LLC, a Hawai'i  
limited liability company,  
et al.,

Defendants,

and

FRANKLIN K. MUKAI,

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO (USA) CO.; LTD.,  
a Delaware corporation, et al.,

) CIVIL NO. CV 04-00124  
) ACK/BMK

) CONSOLIDATED CASES

) **PLAINTIFF'S AND THIRD-PARTY**  
) **DEFENDANTS SPORTS SHINKO CO.,**  
) **LTD., SPORTS SHINKO (HAWAII)**  
) **CO., LTD., SPORTS SHINKO**  
) **(MILILANI) CO., LTD., SPORTS**  
) **SHINKO (KAUAI) CO., LTD.,**  
) **SPORTS SHINKO (PUKALANI) CO.,**  
) **LTD., SPORTS SHINKO RESORT**  
) **HOTEL CORPORATION, SPORTS**  
) **SHINKO (WAIKIKI) CORPORATION,**  
) **AND OCEAN RESORT HOTEL**  
) **CORPORATION'S EX PARTE MOTION**  
) **TO SEAL EXHIBIT "15" TO**  
) **MEMORANDUM IN OPPOSITION TO KG**  
) **DEFENDANTS' MOTION FOR**  
) **SUMMARY JUDGMENT**  
) **IN CV NO. 04-00128 ACK-BMK**  
) **FILED JANUARY 13, 2006;**  
) **DECLARATION OF GLENN T.**  
) **MELCHINGER; PROPOSED ORDER,**  
) **ETC.; CERTIFICATE OF SERVICE**

Third-Party  
Defendants.

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SPORTS SHINKO (USA) CO., LTD.,  
a Delaware corporation,

Plaintiff,

vs.

PUKALANI GOLF CLUB, LLC, a  
Hawai'i limited liability  
company, et al.,

Defendants,

and

FRANKLIN K. MUKAI,

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO CO., LTD.,  
a Japan corporation, et al.,

Third-Party  
Defendants.

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SPORTS SHINKO (USA) CO., LTD, a  
Delaware corporation,

Plaintiff,

vs.

KIAHUNA GOLF CLUB, LLC,  
a Hawai'i limited liability  
company, et al.,

Defendants,

and

FRANKLIN K. MUKAI,

CIVIL NO. CV 04-00125  
ACK/BMK

CIVIL NO. CV 04-00126  
ACK/BMK

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO CO., LTD.,  
a Japan corporation, et al.,

Third-Party  
Defendants.

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SPORTS SHINKO CO., LTD., a  
Japanese corporation,

Plaintiff,

vs.

OR HOTEL, LLC, a Hawai'i  
limited liability company,  
et al.,

Defendants,

and

FRANKLIN K. MUKAI,

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO (USA) CO., LTD.,  
a Delaware corporation, et al.,

Third-Party  
Defendants.

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SPORTS SHINKO (USA) CO., LTD.,  
a Delaware corporation,

Plaintiff,

vs.

CIVIL NO. CV 04-00127  
ACK/BMK

CIVIL NO. CV 04-00128  
ACK/BMK

MILILANI GOLF CLUB, LLC,  
a Hawai'i limited liability  
company, et al.,

Defendants,

and

FRANKLIN K. MUKAI,

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO CO., LTD.,  
a Japan corporation, et al.,

Third-Party  
Defendants.

**PLAINTIFF'S AND THIRD-PARTY DEFENDANTS SPORTS SHINKO CO., LTD.,  
SPORTS SHINKO (HAWAII) CO., LTD., SPORTS SHINKO (MILILANI) CO.,  
LTD., SPORTS SHINKO (KAUAI) CO., LTD., SPORTS SHINKO (PUKALANI)  
CO., LTD., SPORTS SHINKO RESORT HOTEL CORPORATION, SPORTS SHINKO  
(WAIKIKI) CORPORATION, AND OCEAN RESORT HOTEL CORPORATION'S  
EX PARTE MOTION TO SEAL EXHIBIT "15" TO MEMORANDUM IN OPPOSITION  
TO KG DEFENDANTS' MOTION FOR SUMMARY JUDGMENT IN CV NO. 04-00128  
ACK-BMK FILED JANUARY 13, 2006**

Plaintiff and Third-Party Defendants SPORTS SHINKO CO.,  
LTD., SPORTS SHINKO (HAWAII) CO., LTD., SPORTS SHINKO (MILILANI)  
CO., SPORTS SHINKO (KAUAI) CO., LTD., SPORTS SHINKO (PUKALANI)  
CO., LTD., SPORTS SHINKO RESORT HOTEL CORPORATION, SPORTS SHINKO  
(WAIKIKI) CORPORATION, and OCEAN RESORT HOTEL CORPORATION  
(collectively the "SS Entities"), by and through its undersigned  
counsel, respectfully moves this Honorable Court *ex parte* for an  
order sealing pages 35 through 43 to the deposition upon written  
interrogatories of the Custodian of Records of Bank of Hawaii,

which is designated Exhibit "15" to the SS Entities' Memorandum in Opposition and Concise Statement of Facts in Support of Opposition to KG Defendants' Motion for Summary Judgment in CV NO. 04-00128 ACK-BMK, filed January 13, 2006.

This Motion is made on the grounds that Exhibit "15" contains sensitive and confidential personal financial information of Bert A. Kobayashi, Susan Kobayashi, Ronald H. Kobayashi, Sandra Kobayashi and The Kobayashi Group. Thus, the document should not made a part of the Court files which are available for public review.

This Motion is brought pursuant to Rules 5 and 7 of the Federal Rules of Civil Procedure. This Motion is supported by the Declaration of Glenn T. Melchinger, and the records and pleadings on file herein.

DATED: Honolulu, Hawai'i, February 22, 2006.

/s/ Glenn T. Melchinger  
PAUL ALSTON  
GLENN T. MELCHINGER

Attorneys for Plaintiffs  
and Third-Party  
Defendants,  
the SS Entities